# **Drawings:**

Please replace sheet 1 of the drawings with the enclosed replacement sheet 1 of the drawings.

#### REMARKS/ARGUMENTS

Figure 1 of the drawings has been corrected to show the missing reference numbers. For 36, 38, 40 and 108, elements have been added. These elements are inferred by the associated description.

Claims 1-10 are pending in the subject patent application. Claims 1, 4, 5 and 6 have been amended. New claims 11-19 have been added. Support for the amendments is found in the specification, drawings, and claims as originally filed. Applicants respectfully submits, therefore, that the amendments do not add new matter.

A certified copy of the prior Canadian application is enclosed.

## Objection to the Drawings under 37 CFR § 1.84 (p) (5)

The Examiner has objected to the drawings because they are lacking reference numbers mentioned in the description. In response applicants submit replacement drawings herewith.

## Objection to the Claims

The Examiner has objected to claims 4 and 5 due to informalities. In response applicants have amended claims 4 and 5 to address the informalities noted by the Examiner.

### 35 U.S.C. § 103 Claim Rejections

Claims 1 - 3 are rejected as allegedly being unpatentable by U.S. Patent 6,804,316 to Shectman ("Shectman") in view of U.S. Patent 5,923,653 to Denton ("Denton") in view of U.S. Patent 4,967,405 to Upp et al. ("Upp") in view of U.S. Patent 6,359,859 to Brolin et al. ("Brolin").

Applicant respectfully submit that claims 1 - 3 are not rendered obvious in view of the cited references. Claim 1, as amended, includes the following limitations.

An interface device for connecting SONET/SDH termination devices with payload processing devices, comprising: (a) a receive module operative to receive incoming partially compliant SONET/SDH signal streams, to recover bit boundaries, and to recover byte and frame alignment by using 8B/10B coding to find byte boundaries and 8B/10B control characters to find frame boundaries; and (b) a transmit module operative to scramble STS-48 and STS-51, to one of 8B/10B encode and scramble STS-12, to serialize said partially compliant SONET/SDH signal streams, convert said partially compliant SONET/SDH signal streams into outgoing low voltage differential signal (LVDS) levels, and to transmit said partially compliant SONET/SDH signal streams.

Applicants respectfully submit that none of the cited references, alone or in any combination one with another include the limitation of using 8B/10B coding to find byte boundaries and 8B/10B control characters to find frame boundaries. Further, applicants respectfully submit that the further cited references of U.S. Patent 6,778,778 to Richards et al. ("Richards"), U.S. Patent 5,455,832 to Bowmaster ("Bowmaster"), and U.S. Patent 5,774,242 to O'Sullivan et al. ("O'Sullivan") do not remedy the cited references of Shectman, Denton, Upp, and Brolin in this regard. None of the cited references disclose or suggest such limitation.

A second distinction of claim 1 from the cited references resides in the fact that Applicant's interface can function with partially compliant SONET/SDH streams rather than only fully compliant SONET/SDH streams. In the present application the SONET/SDH signal is contained within a piece of equipment rather than facing the public SONET/SDH network as do the framers of the cited references. It is for this reason that Applicant's SONET/SDH stream need not be fully compliant but can be simplified. On the other hand, Shectman, Denton, Upp and Brolin all teach SONET framers that face the public SONET/SDH network and, therefore, the incoming stream from the public SONET/SDH network must be fully SONET compliant. Applicant uses serial SONET-like links within an item of telecommunications equipment to

inter-connect data streams. Instead of connecting to SONET fibers, the present interface device connects components within a box over a backplane printed circuit board.

Contrary to the statement on page 7, STS-51 is not an official ANSI or ITU rate No equipment in the public SONET/SDH network would interface to a fiber operating at the STS-51 rate and the frame structure described in the application. STS-51 is an extension of existing protocols and, therefore, is novel.

For these reasons applicants respectfully submit that claim 1 is not anticipated nor rendered obvious by any of Shectman, Denton, Upp, Brolin, Richards, Bowmaster, and O'Sullivan, alone or in combination. Given that claims 2 - 10 depend, directly or indirectly, from claim 1, applicants respectfully submit that claims 2 - 10, are, likewise, not rendered obvious by the cited references.

In regard to new claims 11 - 19, applicants respectfully submit that new claims 11 - 19 are not rendered obvious by any of the cited references. New claim 11 includes the limitations of a receive module comprising multiple receivers and an interface device operative to find mutual frame alignment of SONET/SDH frames on said receivers. Applicants respectfully submit that claim 11 includes patentable subject matter as identified by the Examiner.

For these reasons applicants respectfully submit that claim 11 is not anticipated nor rendered obvious by any of Shectman, Denton, Upp, Brolin, Richards, Bowmaster, and O'Sullivan, alone or in combination. Given that claims 12 – 19 depend, directly or indirectly, from claim 11, applicants respectfully submit that claims 12 – 19, are, likewise, not rendered obvious by the cited references.

#### **CONCLUSION**

For at least the foregoing reasons, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner has any further questions or comments concerning the amendments made herein, he is encouraged to telephone the undersigned at 408-282-1809.

Respectfully submitted,

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